

# Exhibit 34

Page 1

UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF VIRGINIA  
LULA WILLIAMS, et al.,  
PLAINTIFF,  
vs. Civil Action No.:  
3:17-cv-461

BIG PICTURE LOANS, LLC, et al.,  
DEFENDANT.

-----  
RENEE GALLOWAY, et al.,  
PLAINTIFF,  
vs. Civil Action No.:  
3:18-cv-406

BIG PICTURE LOANS, LLC, et al.,  
DEFENDANT.

Videotaped deposition of JOHN WILLIAMS taken  
pursuant to notice, was held virtually commencing  
June 22, 2020, 10:16 a.m. CST, on the above date,  
before Carla S. Kimbrough, Certified Shorthand  
Reporter in the State of Oklahoma.

MAGNA LEGAL SERVICES  
(866) 624-6221  
[www.MagnaLS.com](http://www.MagnaLS.com)

Page 183

1 destroy or whatever, right?

2 A Correct.

3 Q And then you looked at the agreement, the  
4 Clear Lake agreement, that we marked as an exhibit.  
5 And you acknowledged that there was no such -- no  
6 similar provision in that agreement, correct?

7 A Via my scan of it, no.

8 Q Okay. And when you say your scan of it, I  
9 mean you had a chance to read the whole, thing,  
10 right?

11 A Yes, I read it.

12 Q You looked through the whole thing.

13 A I read it. I did not see one.

14 Q Okay. Now -- and give a moment because I  
15 know there's going to be an objection so, but we  
16 want -- we need to have it right for the record,  
17 okay? So just take a second.

18 Did Mr. Martorello advise you to put  
19 paragraph 2.6D or provisions to that effect into  
20 the merger agreement between Bellicose, Eventide,  
21 Bellicose, and the tribe?

22 MR. GRAY: I'm going to object to the  
23 extent it calls for attorney/client privileged  
24 information and advise you not to answer.

25 Q (By Mr. Caddell) And, Mr. Williams, are

Page 184

1 you going to follow that advice with -- that I  
2 guess was expressed by Mr. Gray?

3 A Yes.

4 Q Okay. All right.

5 MR. WITSCH: Mr. Caddell, just so the  
6 record is clear to the extent that it calls for  
7 information that Matt may have had individually and  
8 just to maintain our position is clear, to the  
9 extent that that is a privilege, it could be held  
10 by Matt, you know, we would raise the same  
11 objection.

12 MR. CADDELL: Okay. That's fine.

13 Q (By Mr. Caddell) Okay. Now,  
14 Mr. Williams, I'm done for the time being.  
15 Mr. Witsch may have some more and -- but hopefully  
16 it won't be too long and this will be over shortly  
17 and you can enjoy the rest of your day.

18 THE WITNESS: Okay.

19 MR. CADDELL: Thank you for your time. I  
20 appreciate it, and I know it's been an imposition.  
21 And thank you for your patience.

22 THE WITNESS: Thank you.

23 MR. WITSCH: Mr. Williams, I actually  
24 don't think I need a break. I only have a couple  
25 of questions for you.